

Memorandum

DATE: JULY 15, 2008

TO: All Tank Owners, Tanks Installers, and Service Providers

FROM: Stan Boyd 

RE: Sump Sensors Used in Secondary Containment Interstitial Monitoring

In response to questions received relative to interstitial monitoring, the Division is issuing the following guidance:

The Division will not accept visual observation as a means of interstitial monitoring for pressurized piping.

Monthly visual observation is not a method of tank or piping leak detection in rule 1200-1-15-.04(4). Monthly visual observation does not provide a means of catastrophic line leak detection in the event of a piping leak. Electronic sensors which indicate the presence of liquid or product can be used in sumps to provide continuous monitoring. Sensors must be placed at the lowest point in the sump and must be tested for proper operation at least once per year.

When electronic sensors are used to provide interstitial monitoring for secondary containment, the sensors must be installed in any location where leaking product can accumulate.

The rules do not require the integrity of the secondary containment system be monitored; therefore secondary containment may develop a breach at some point which could allow a leak to leave the system undetected by a single sensor. Electronic sensors must be installed in every sump where sensors are used to provide interstitial monitoring in secondarily contained piping systems.